

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GALLERIA 2425 Owner, LLC

Debtor.

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Case No. 23-34815 (JPN)

Chapter 11

**SECOND AMENDED WITNESS AND EXHIBIT LIST FOR FEBRUARY 11, 2025
EMERGENCY HEARING ON NBK’S EMERGENCY MOTION FOR CONTEMPT
(Related to ECF No. 931)**

National Bank of Kuwait, S.A.K.P., New York Branch (“NBK”), for itself and Houston 2425 Galleria, LLC (“Houston 2425”), files this Second Amended Witness and Exhibit List for the emergency hearing¹ to be held February 11, 2025, beginning at 2:30 p.m. (prevailing Central Time) (the “Hearing”) on NBK’s *Emergency Motion for Contempt Against Jetall Companies, Inc., Jetall Capital, LLC, 2425 WL, LLC, and Justin Rayome for Violation of Bankruptcy Court’s Orders* [ECF No. 931].

WITNESS LIST

NBK and/or Houston 2425 may call the following witnesses at the Hearing:

1. Justin Rayome.
2. Ali Choudhri.
3. Gene McCubbin.
4. Carol Bernard.
5. Corporate Representative(s) of Jetall Companies, Inc.
6. Corporate Representative(s) of Jetall Capital, LLC.

¹ Originally scheduled for January 24, 2025, and then rescheduled for January 29, 2025.

7. Corporate Representative(s) of 2425 WL, LLC.
8. Any witness called by any other party.
9. Any witness(es) necessary to rebut the testimony of any witness(es) called or designated by any other party.

EXHIBIT LIST

Exhibit	Description	Offer	Object	Admit	Disposition
1.	Order (A) Approving Asset Purchase Agreement Between the Trustee and QB Loop Property LP; (B) Approving the Sale of the Property Free and Clear of All Liens, Claims, Encumbrances, and Other Interests; (C) Approving Assumption and Assignment of Executory Contracts and Leases; (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases; and (E) Granting Related Relief [ECF No. 608]				
2.	Order Granting NBK's Emergency (Renewed) Motion to Enforce Sale Order and Requiring Jetall Companies, Inc. to Vacate Property [ECF No. 871]				
3.	Order Disallowing Proof of Claim and Referral to United States Attorney [ECF No. 717]				
4.	Order Releasing Deed of Trust Instrument No. RP-2021-258619 [ECF No. 872]				
5.	Order Cancelling Lis Pendens [ECF No. 911]				
6.	Jetall Companies, Inc. and 2425 WL, LLC's Notice of Appeal [ECF No. 875]				
7.	Order Denying Emergency Motion [ECF No. 897]				
8.	December 11, 2024, minute entry order, <i>Jetall Companies, Inc. and 2425 WL, Inc. v. National Bank of Kuwait, S.A.K.P., New York Branch, et al.</i> , Case No. 4:24-cv-04835, United States District Court, Southern District of Texas				

Exhibit	Description	Offer	Object	Admit	Disposition
9.	January 15, 2025, email from Justin Rayome to Carol Bernard, Vice President at First American Title [ECF No. 931-1]				
10.	Order denying request for stay pending appeal, <i>Jetall v. National Bank of Kuwait</i> , Case No. 24-20552, United States Court of Appeals for the Fifth Circuit, ECF No. 26				
11.	LinkedIn page of Justin Rayome as of January 22, 2025 (redacted)				
12.	December 19, 2024 Appearance of Counsel filed by Justin Rayome in <i>Quinlan, et al. v. Jetall Companies, Inc. et al.</i> , Case No. 22-32998 (S.D. Tex.) [ECF No. 931-2]				
13.	Appearance of Counsel Justin Rayome, <i>Jetall Companies, Inc. v. Jackson Walker, LLP, et al.</i> , Case No. 24-03257, ECF No. 1-2				
14.	Appearance of Counsel Justin Rayome, <i>In re: Jetall Companies, Inc., Alleged Debtor</i> , Case No. 24-35761, ECF No. 24				
15.	Notice of Removal with Original Petition, <i>Jetall Companies, Inc. v. Jackson Walker, LLP, et al.</i> , Cause No. 2024-83809 (55th Dist. Ct. Tex.), removed to this Court under Adversary No. 24-03257, ECF No. 1				
16.	Notice of Hearing on Amended Motion for Remand [ECF No. 924]				
17-A	Service List for NBK's (Renewed) Emergency Motion to Enforce Sale Order (Jetall Companies, Inc.), ECF No. 838				
17-B	Service List for NBK's Second Emergency Motion to Enforce Sale Order (2425 WL, LLC), ECF No. 839				
17-C	Service List for NBK's Supplement to Emergency Motions to Enforce Sale Orders, ECF No. 861				
17-D	Service List for NBK's Third Emergency Motion to Enforce Sale Order (Jetall Companies, Inc. – Lis Pendens), ECF No. 895				
18.	NBK's (Renewed) Emergency Motion to Enforce Sale Order (Jetall Companies, Inc.) [ECF No. 838]				

Exhibit	Description	Offer	Object	Admit	Disposition
19.	Plaintiff's Original Petition, filed January 23, 2025, at 9:58 AM, <i>Jetall Companies, Inc. vs. Jackson Walker, LLP and Houston 2425 Galleria, LLC</i> , in the 281st Judicial District Court, Harris County, Texas, Cause No. 2025-04456				
20.	Notice of Lis Pendens Regarding 2425 West Loop South Property, filed of record on January 23, 2025 in the in the Real Property Records of Harris County, Texas, RP-2025-23705				
21.	Notice of Removal, Jetall Companies, Inc. v. Jackson Waler, LLP, et al., Adversary No. 25-03016, ECF No. 1				
22.	Exhibit D, December 2 Lis Pendens (ECF No. 1-4)				
23.	Exhibit E, December 23 Lis Pendens (ECF No. 1-5)				
24.	Exhibit F, January 23 Lis Pendens (ECF No. 1-6)				
25.	Exhibit G, January 24 Lis Pendens (ECF No. 1-7)				
26.	Email from Justin Rayome to Carol Bernard dated January 15, 2025 3:44 PM, Subject: 2425 – West Loop South, with attachments (<i>see also</i> Exhibit A, ECF No. 931-1)				
27.	Email from Justin Rayome to Carol Bernard dated January 24, 2025 11:43 AM, Subject: 2425 West Loop South – Lis Pendens, with attachment (RP-2025-23705)				
28.	Email from Justin Rayome to Carol Bernard dated January 24, 2025 1:34 PM, Subject: 2425 West Loop South – Lis Pendens, with attachment (RP-2025-25888)				
29.	Email from Ali Choudhri to Carol Bernard dated January 29, 2025 11:17 AM, Subject: 2425 West Loop Houston Texas 77027, with attachment				
30.	January 29, 2025 email from “Ali @ Jetall” to Carol Bernard and others, BATES000004				

Exhibit	Description	Offer	Object	Admit	Disposition
31.	Notice of Appeal, ECF No. 963, BATES000005				
	Any exhibit identified or offered by any other party.				
	Any exhibit necessary for impeachment and/or rebuttal purposes.				

RESERVATION OF RIGHTS

NBK and Houston 2425 reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this Witness and Exhibit List before the Hearing.

Dated: February 6, 2025
Houston, Texas

**PILLSBURY WINTHROP SHAW
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/s/ Charles C. Conrad

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